

PROJECT TRANSITION

Site History Summary and Issues

Voluntary Cleanup Program

July 2001

Project Name: Oregon Steel Mills

Responsible Party(s): Oregon Steel Mills (OSM)

Consultant: Exponent

Program: Voluntary Cleanup Program (VCP)

Project Team: PM: Bruce Brody-Heine (new as of July 2001)
Peer: Rod Struck (former PM)
Hydro: Bruce Brody-Heine

1. Key Historical Issues

Property Ownership:

Pre-1967: Port of Portland
1967 to present: Oregon Steel Mills

Key Investigative Issues:

- A. 1944- 1961 Oil Sump present on property (undeveloped land with dredge fill placed on property over time).
- B. March 1981 Electric Arc Furnace (EAF) dust in DRD pond excavated and disposed properly. Groundwater wells installed and 2 years of groundwater monitoring were conducted. Data was compared to maximum contaminant levels (MCLs). DEQ and EPA administratively closed 1987.
- C. 1982 & 1985 Polychlorinatedbiphenols (PCB) spills and remedial excavation.
& 1991/1992 Retrofit PCB transformers and conducted a risk assessment – no risk identified, however OSM excavated and disposed of material with PCBs concentrations greater than 1 mg/kg.
- D. 1985 & 1986 Underground storage tanks (UST) releases - 3 areas – Gasoline and diesel fuels.
- E. 1985 EPA Compliance Inspection identified a small area where methyl ethyl ketone (MEK) was used and staining suggested a possible release.
- F. 1986 Paint waste located on ground surface north and south of surface finishing building was excavated and placed in an onsite landfill.

- G. 1986 Creosote found during river dredging (approximately 100 feet offshore).
- H. 1992 RCRA Facility Assessment. 6 solid waste management units (SWMUs) were identified
- PCB Shed
 - Scarf area concrete lined sump
 - Landfill
 - Melt shop furnace
 - Vehicle maintenance accumulation area
 - Scrap piles
- I. 1995 On-site landfill closure. Landfill contains paint wastes, mullite (kaolinite clay), ceramic refractory furnace slag, and mill scale. 2-years of groundwater monitoring was conducted in monitoring wells surrounding the landfill. This groundwater data was compared to MCLs. DEQ approves formal closure.
- J. 1994 Scrap yard investigation is conducted (test pits and soil sampling) – total petroleum hydrocarbons (TPH) and metals detected in the soil samples.
- K. 1995 UST release reported near west end of rolling mill.
- L. 1996 Mosley Shear area, concrete slab preparation excavation found soil contamination. TPH, volatile organic compounds (VOC) , and PCBs were detected in soils. A small remedial excavation was conducted.
- M. 1997 Above ground storage tank (AST) gasoline release reported along the north fence line.

2. Key Site Issues/Data Gaps

Project is a Portland Harbor site under the standard Portland Harbor VCP formal Agreement. The project is currently in the Pre-Remedial Investigation/Preliminary Assessment (PA) stage. Based upon the current analytical data the site will require a RI. Following completion of the Pre-RI/PA report, a RI proposal will be submitted followed by the RI Work Plan.

Sources and Contaminants of Interest (COI)

- Refer to the compounds identified above in Key Historical Issues
- DEQ has requested the following
 - locations of previous and existing sources,
 - historical release information summary (including all spills information)
 - summary of results of investigations conducted to date
 - complete list of compounds of interest (COIs)

to be summarized in the final PA document. In addition, DEQ has requested that OSM

compare previous data, and/or the basis of previous decisions to most current risk-based concentrations (RBCs). This will be used as a screening of the of COIs for both ecological and human receptors.

Contamination Nature and Extent

The information summarized in the completed PA will be used to evaluate existing sources and evaluate their preliminary nature and extent. Some of the major source areas that need to be addressed include:

- Historic oil sump area
- Historical review did not look at the northern portion (appears to be 1/3rd of the site).
- UST releases
- Spills (all petroleum hydrocarbon spills)

Preliminary Pathways and Receptors (needs to be completed)

- DEQ and OSM need to reach agreement on Preliminary Conceptual Site Exposure Pathway Mode and the Preliminary Conceptual Hydrogeologic Site Model.

3. Previously Agreed Upon Issues Between DEQ VCP and OSM.

No other issues identified. The site is early in the investigation process. Rod Struck, the original site Project Manager, will remain on project as peer support to ensure continuity of historical project management issues.

4. Project Direction to Resolve Data Gaps

The next step on the project is the completion of the Pre-RI/PA to identify the existing and potential sources of hazardous substances. This information will be used to develop the RI Work Plan Outline and the RI Work Plan that will characterize the nature and extent of the contamination and evaluate the potential risk(s) posed by existing sources.

5. RP Expectations:

The RP is interested in downgrading their "high" priority status which is a perception issue for OSM. OSM has submitted draft portions of a PA report. OSM is not particularly interested in reopening the previously closed, and approved, areas (such as the landfill or other RCRA identified sites that were previously investigated and cleaned up or closed).

6. Schedule

- PM transition will occur in mid-June 2001.
- August 10, 2001 Pre-RI Field Work - Phase II Letter Work Plan
- August 17, 2001 DEQ Review
- August 2001 Pre-RI Field Work - Phase II Implementation
- November 16, 2001 Pre-RI Summary Report submitted

Date: July 2001
Prepared by: Bruce Brody-Heine

- December 18, 2001 DEQ comments on Pre-RI Summary Report
- January 18, 2002 RI Proposal
- February 18, 2002 DEQ review of the RI Proposal
- March 31, 2002 RI Work Plan

7. Estimate to Complete Project Transition/File Review

Approximately 35 hours.